THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON

ANGELICA SILVA,

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Plaintiff,

v.

ROSARIO SIGNAL, LLC, a Washington corporation,

Defendant.

NO: 2:23-cv-00640 JCC

STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINES

STIPULATED MOTION

Pursuant to LCR 7(d)(1) and LCR 7(j), the parties hereby jointly request that the Court modify certain deadlines and the trial date as currently scheduled in the Civil Trial Scheduling Order (Dkt. #11).

- 1. The parties have been engaging in good faith efforts to negotiate resolution to this matter, but the parties have been unable to schedule a mediation until June 27, 2024 due to conflicting schedules and lack of acceptable mediator availability. Mediation is now set for June 27, 2024.
- 2. The parties respectfully request that the Court allow the parties to save the expense of litigating summary judgment motions until after the scheduled mediation for June 27, 2024 in the event that the case reaches full and final resolution by that date.

STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINES (2:23-cv-00640) - Page 1

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25 26 3. The parties would like to retain all other case-related deadlines, and request that only the below deadlines be modified as follows:

<u>Event</u>	Current Deadline	Proposed Deadline
Settlement conference or Rule 39.1	June 10, 2024	June 27, 2024
Mediation		
Dispositive Motion Deadline	June 24, 2024	July 1, 2024

The parties respectfully request that the Court enter an order approving these dates and resetting the other pretrial deadlines accordingly, or alternatively, to approve such other dates as fit the Court's schedule.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 12th date of June 2024.

By: /s/ Catharine M. Morisset

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Attorneys for Defendant

Seattle, WA 98101

By: /s/ Amy K. Maloney

Amy K. Maloney, WSBA #55610 Matt J. O'Laughlin, WSBA #48706 MALONEY O'LAUGHLIN, PLLC 200 West Mercer Street, Ste. 506 Seattle, Washington 98119

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Attorneys for Plaintiff

STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINES (2:23-cv-00640) - Page 2

FISHER & PHILLIPS LLP $1700~7^{\text{TH}}$ AVENUE, SUITE 2200 SEATTLE, WA 98101 Phone: (206) 682-2308 Fax: (206) 682-7908 **ORDER**

This matter came before the Court on the parties' Stipulated Motion and Proposed Order to Extend Deadlines. The Court has reviewed and considered the files and pleadings in this case and hereby ORDERS that the proposed amended case scheduling deadlines set forth in the above stipulation are adopted and approved by the Court. The Clerk shall issue an Amended Civil Trial Scheduling Order consistent with this order.

DATED this 12th day of June, 2024.

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THE HONORABLE JOHN C. COUGHENOUR UNITED STATES DISTRICT COURT JUDGE

STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINES (2:23-cv-00640) - Page 3

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1 CERTIFICATE OF SERVICE 2 The undersigned hereby certifies under the laws of the state of Washington that on the date written below, I caused a true and correct copy of the foregoing document to be filed with 3 the Clerk of the Court using the CM/ECF system, which will send notification of such filing to 4 5 the following: 6 Amy K. Maloney, WSBA #55610 Matt J. O'Laughlin, WSBA #48706 7 MALONEY O'LAUGHLIN, PLLC 200 West Mercer Street, Ste. 506 8 Seattle, Washington 98119 9 Telephone: (206) 513-7485 Facsimile: (206) 260-3231 10 Email: amy@pacwestjustice.com matt@pacwestjustice.com 11 Attorneys for Plaintiff 12 13 Executed on June 12, 2024, in accordance with 28 USC 1746. 14 s/Tammy Weisser Tammy Weisser, Legal Assistant 15 16 17 18 19 20 21 22 23 24 25 26 FISHER & PHILLIPS LLP

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